

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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	:
In re	: Chapter 11
	:
DELPHI CORPORATION, <u>et al.</u>	: Case No. 05-44481 (RDD)
	:
Debtors.	: (Jointly Administered)
	:
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DESCRIPTION OF ADMINISTRATIVE EXPENSE CLAIM
OF DONALD R. SWEETON AND SARAH E. SWEETON

A portion of the administrative expense claim of Donald R. Sweeton and Sarah E. Sweeton (the "Sweetons") is based on the use by Delphi Automotive Systems, LLC ("Delphi Automotive") of certain real property (the "Subject Property") located in Columbia, Tennessee, pursuant to a pre-petition Warehouse Lease between the Sweetons and Delphi Automotive. Copies of the Warehouse Lease and amendments thereto (collectively, the "Lease") between the Sweetons and Delphi Automotive were attached to the Sweeton's Proof of Claim filed in this case. A portion of the administrative expense claim is also based on certain post-petition agreements between the Sweetons and Delphi Automotive pursuant to which the Sweetons provided certain goods and services to Delphi Automotive or made expenditures that benefited Delphi Automotive. The administrative expense claim is described in greater detail below:

1. During the post-petition period, Delphi Automotive requested that the Sweetons provide certain services, including storage, transportation of dunnage, maintenance and repairs relating to the Subject Property. Delphi Automotive agreed to reimburse the Sweetons for these services. Invoices for these services remain unpaid and total at least \$38,840.05. Copies of these invoices are attached hereto.

2. During the post-petition period, Delphi Automotive requested that the Sweetons obtain insurance for the Subject Property and agreed to reimburse the Sweetons for the expense of the insurance. ~~Invoices for insurance remain unpaid and total at least \$166,063.43. Copies of these invoices are attached hereto.~~

3. During the post-petition period, Delphi Automotive requested that the Sweetons pay certain taxes relating to the Subject Property and agreed to reimburse the Sweetons for the expense of these taxes. The invoice for these taxes remains unpaid and totals at least \$32,438.30. A copy of this invoice is attached hereto.

4. During the post-petition period, the Sweetons conducted a walk-through of the Subject Property with a representative of Delphi Automotive, and a number of items that required repair were identified in this process. The anticipated cost of repairing this damage is estimated to be at least \$236,938.50, as reflected in the attached proposals.

5. During the post-petition period, Delphi Automotive's use of the Subject Property in the course of its business resulted in environmental contamination of the Subject Property. This contamination was discovered in late 2008. Additionally, in October 2008, vandalism occurred on the Subject Property that resulted in both physical damage to the Subject Property and additional environmental contamination of the Subject Property. The anticipated cost of remediating the environmental contamination is at least \$127,199.75, as reflected in the attached environmental assessment. The anticipated cost of repairing ventilation damage, breakroom wall and door damage and replacing glass in doors resulting from the vandalism that occurred on the Subject Property is estimated to be at least \$33,365, as reflected in the attached proposals.

6. Attorney's fees, costs and expenses in an amount to be determined.

BUILDING CLEANUP PUNCH LIST

Revised 16Sept08

Item Description	EXACT Location (Post #s)	Opened	Closed	PO #	Invoice #	Amount	Comments	Quote #	Delphi PR (Tracing #)	Quote \$	Quote Details
1 Bottom edge of Grade Level rollup door damaged	South end of building	7/1/2008	Included in the Quote for Item 5				Reviewed with Dasco (Don and Sarah Sweeton) on 31 July. Quotes by 14 Aug.				
2 Fix broken & damaged floors from anchor bolts	Exact locations to follow	7/1/2008					Reviewed with Dasco (Don and Sarah Sweeton) on 31 July. Quotes by 14 Aug. Not all areas can be inspected at this time.	080808-001	A00580		The initial estimate is 1,175 holes, 1/2" to 5/8" ... \$23.80 each 1/2" ... \$28.70 each
3 Main Gate - Truck Damage		7/1/2008					Reviewed with Dasco (Don and Sarah Sweeton) on 31 July. Quotes by 11 Aug.	080808-002	A00580	\$ 26,995.00	
4 Broken concrete in truck entrance drive (4 places)		7/1/2008					Reviewed with Dasco (Don and Sarah Sweeton) on 31 July. Quotes by 12 Sept.	082808-003	A00600	\$ 23,660.00	
5 Dock Bumpers and Seals	All Docks	7/1/2008					Reviewed with Dasco (Don and Sarah Sweeton) on 31 July. Quotes by 12 Sept.		A00588	\$ 50,540.00	
6 Replace Automatic Drain on Compressed Air Reservoir	Compressor Room	7/1/2008	Replaced 8/20/2008	Item Replaced by Delphi			Reviewed with Dasco (Don and Sarah Sweeton) on 31 July. Quotes by 12 Sept.				
7 Dock 20 Dock lock		7/1/2008	8/8/2008	Replaced by Delphi			Reviewed with Dasco (Don and Sarah Sweeton) on 31 July. Quotes by 12 Sept.				
8 AC mounting holes in PBX room	PBX Room	7/1/2008					Reviewed with Dasco (Don and Sarah Sweeton) on 31 July. Quotes by 14 Aug.	080808-004	A00590	\$ 430.00	
9 Replace original PC&L office		7/1/2008					Reviewed with Dasco (Don and Sarah Sweeton) on 31 July. Quotes by 11 Aug.	080808-008	A00595	\$ 40,125.00	
10 Replace original janitor's closet		7/1/2008					Reviewed with Dasco (Don and Sarah Sweeton) on 31 July. Quotes by 11 Aug.	080808-007	A00594	\$ 3,860.00	
11 Seal Wall opening in Engineer's office & reconnect light switch at original door		7/1/2008					Reviewed with Dasco (Don and Sarah Sweeton) on 31 July. Quotes by 14 Aug.	080808-009	A00505	\$ 2,890.00	
12 Hole in rear wall where electrical for trailer was run	Between Dock 1 & Column 2	7/1/2008					Reviewed with Dasco (Don and Sarah Sweeton) on 31 July. Quotes by 14 Aug.	080808-010	A00592	\$ 320.00	
13 Replace damaged heater thermostats		7/1/2008					Reviewed with Dasco (Don and Sarah Sweeton) on 31 July. Quotes by 12 Sept.				
14 Environmental Site Assessment		7/1/2008					Reviewed with Dasco (Don and Sarah Sweeton) on 31 July. Quotes by 12 Sept.				
15 Towmotor damage to office walls outside C Dec's office & Jonathan's office		7/1/2008					Reviewed with Dasco (Don and Sarah Sweeton) on 31 July. Quotes by 14 Aug.	080808-005	A00591	\$ 2,890.00	
16 Clean & Re-paint inside facility		7/1/2008					Reviewed with Dasco (Don and Sarah Sweeton) on 31 July. Quotes by 12 Sept.				
17 Clean Battery room		7/1/2008					Reviewed with Dasco (Don and Sarah Sweeton) on 31 July. Quotes by 14 Aug.	080808-006	A00593	\$ 28,560.00	
18 Roof Insulation		7/1/2008					Reviewed with Dasco (Don and Sarah Sweeton) on 31 July. Quotes by 12 Sept.				
19 Breakroom middle counter/cabinets		7/1/2008					Reviewed with Dasco (Don and Sarah Sweeton) on 31 July. Quotes by 12 Sept.				
20 Replace all carpeted floors		7/1/2008					Reviewed with Dasco (Don and Sarah Sweeton) on 31 July. Quotes by 12 Sept.				

BUILDING CLEANUP PUNCH LIST

Revised 06Aug

Item Description	EXACT Location (Post #s)	Opened	Closed	PO #	Invoice #	Amount
Bottom edge of Grade Level rollup door damaged	South end of building	7/1/2008				
Fix broken & damaged floors from anchor bolts	Exact locations to follow	7/1/2008				
Main Gate - Truck Damage		7/1/2008				
Broken concrete in truck entrance drive (4 places)		7/1/2008				
Dock Bumpers and Seals	All Docks	7/1/2008				
Replace Automatic Drain on Compressed Air Reservoir	Compressor Room	7/1/2008				
Dock 20 Dock lock		7/1/2008				
AC mounting holes in PBX room	PBX Room	7/1/2008				
Replace original PC&L office		7/1/2008				
Replace original Janitor's closet		7/1/2008				
Seal Wall opening in Engineer's office & reconnect light switch at original door		7/1/2008				
Hole in rear wall were electrical for trailer was run	Between Dock 1 & Column 2	7/1/2008				
Replace damaged heater thermostats		7/1/2008				
Environmental Site Assessment		7/1/2008				
Towmotor damage to office walls	outside C Dec's office & Jonathan's office	7/1/2008				

DELPHI

Date: 9/18/2008

To: Sarah Swanton

From: Tom Welch

Fax: 931-762-4944

Phone:

Fax:

Phone:

Subject: Quotes

c:

Number of pages including cover sheet: 1

Problems with the receipt of this transmission,
contact:

☐ Urgent

☐ For Review

☐ Please Reply

Sarah, got the quotes Don brought over, Thanks

How about the quotes for replacing the carpet, repairing
the Break room counters and the Environmental
Assessment?

Thanks

- Meeting 2) carpet people Monday
- Counters in Quote on Break room
- Call in for Environmental

Sarah

DASCO, INC.

214 ADMIRAL CIRCLE
LAWRENCEBURG, TN 38464

Invoice

Date	Invoice #
9/4/2008	17487

Bill To
DELPHI 1974 Ridgcrest Drive Columbia, TN 38401

P.O. No.	Terms	Project
LEASE	Net 30	

Quantity	Description	Rate	Amount
	2006-2007 WORKERS COMPENSATION @ \$.6577 PER SQ FT 61,680 SQ FT @ \$.6577	0.00 40,567.00	0.00 40,567.00
	2006-2007 AUTO POLICY @ .2662 PER SQ FT 61,680 SQ FT @ \$.2662	16,422.00	0.00 16,422.00
	2005-2006 WORKERS COMPENSATION @ \$.5557 61,680 SQ FT @ \$.5557	0.00 34,275.00	0.00 34,275.00
	2005-2006 AUTO POLICY \$.2757 61,680 SQ FT @ \$.2757	0.00 16,867.00	0.00 16,867.00
TERMS: 1-1/2% Per Month Service Charge on Accounts Past Due		Total	\$108,131.00

DASCO, INC.

214 ADMIRAL CIRCLE
LAWRENCEBURG, TN 38464

Invoice

Date	Invoice #
8/6/2008	17485

Bill To
DELPHI OPERATIONS SUPPORT GROUP R/E PROPERTY ADMIN. 5825 DELPHI DRIVE MC 480-410-174 TROY, MI 48098

P.O. No.	Terms	Project
LEASE	Net	

Quantity	Description	Rate	Amount
	CORRECTED INVOICE (17454) 9-1-07- TO 9-1--08 RENEWAL	0.00	0.00
	BLDG 1 - WH - PROPERTY & BUSINESS INCOME 60,000 SQ FT @ \$.1751	10,506.00	10,506.00
	BLDG 2- AUX - PROPERTY & BUSINESS INCOME 1,680 SQ FT @ \$.1314	220.75	220.75
	BLDG 1 - WH - GENERAL LIABILITY 60,000 SQ FT @ \$.0169	1,014.00	1,014.00
	BLDG 2- AUX - GENERAL LIABILITY 1,680 SQ FT @ \$.0169	28.00	28.00
	AUTO 61,680 SQ FT @ .2677	16,511.00	16,511.00
	WORKER'S COMP 61,680 SQ FT @ .4349	26,825.00	26,825.00
	PREMIUM/SQUARE FOOTAGE AS PROVIDED LOIS JANKOW, R/E PROPERTY ADMIN MGR BY MARKUS INSURANCE AGENCY.		
		Total	\$55,104.75

DASCO, INC.

214 ADMIRAL CIRCLE
LAWRENCEBURG, TN 38464

Invoice

Date	Invoice #
12/31/2008	17499

Bill To
DELPHI OPERATIONS SUPPORT GROUP R/E PROPERTY ADMIN. 5825 DELPHI DRIVE MC 480-410-174 TROY, MI 48098

P.O. No.	Terms	Project
LEASE	Net	

Quantity	Description	Rate	Amount
	2008 MAURY COUNTY PROPERTY TAX \$23,148.00 (60,000 SQ FT)	0.00	0.00
	2008 COLUMBIA CITY PROPERTY TAX \$12,778.00 (60,000 SQ FT)	0.00	0.00
	\$35,926.00/12 = \$2993.83 PER MONTH		
10	JANUARY 1, 2008 TO OCTOBER 31, 2008)10 MOS)	2,993.83	29,938.30
	\$2,993.83/MO// 60,000 SQ FT = \$.05/SQ FT	0.00	0.00
25,000	25,000 SQ FT X \$.05 (NOVEMBER, 20088)	0.05	1,250.00
25,000	25,000 SQ FT X \$.05 (DECEMBER, 2008)	0.05	1,250.00
TERMS: 1-1/2% Per Month Service Charge on Accounts Past Due		Total	\$32,438.30

DASCO, INC.

214 ADMIRAL CIRCLE
LAWRENCEBURG, TN 38464

Invoice

Date	Invoice #
12/31/2008	17500

Bill To
DELPHI OPERATIONS SUPPORT GROUP R/E PROPERTY ADMIN. 5825 DELPHI DRIVE MC 480-410-174 TROY, MI 48098

P.O. No.	Terms	Project
LEASE	Net	

Quantity	Description	Rate	Amount
	PROPERTY INSURANCE RENEWAL 9-1-08 TO 9-1-09 - TOTAL \$11,709.00 / 12MOS = \$975.75 MO \$975.75 / 66,404 SQ FT = \$.015 PER SQ FT PER MO	0.00	0.00
61,000	SEPTEMBER, 2008 - 61,000 SQ FT	0.015	915.00
61,000	OCTOBER, 2008 - 61,000 SQ FT	0.015	915.00
25,000	NOVEMBER, 2008 - 25,000 SQ FT	0.015	375.00
25,000	DECEMBER, 2008 - 25,000 SQ FT	0.015	375.00
	GENERAL LIABILITY - TOTAL \$1159/12 MOS = \$96.58 MO \$96.58 MO/66,404 SQ FT/ \$.00144 MO.		
61,000	SEPTEMBER, 2008 - 61,000 SQ FT	0.00144	87.84
61,000	OCTOBER, 2008 - 61,000 SQ FT	0.00144	87.84
25,000	NOVEMBER, 2008 - 25,000 SQ FT	0.00144	36.00
25,000	DECEMBER, 2008 - 25,000 SQ FT	0.00144	36.00
TERMS: 1-1/2% Per Month Service Charge on Accounts Past Due		Total	\$2,827.68

DASCO, INC.

214 ADMIRAL CIRCLE
LAWRENCEBURG, TN 38464

Invoice

Date	Invoice #
1/31/2008	*17396

Bill To
DELPHI 1974 Ridgecrest Drive Columbia, TN 38401

P.O. No.	Terms	Project
450652695	Net 30	

Quantity	Description	Rate	Amount
2,398	2398) STACKABLE UNITS	3.00	7,194.00
120	120 UNSTACKABLE UNITS (4 X)	3.00	360.00
48	48) SECURE UNITS @ \$10	10.00	480.00
	ON SITE STORAGE		
TERMS: 1-1/2% Per Month Service Charge on Accounts Past Due		Total	\$8,034.00

DASCO, INC.

214 ADMIRAL CIRCLE
LAWRENCEBURG, TN 38464

Invoice

Date	Invoice #
1/31/2008	*17397

Bill To
DELPHI 1974 Ridgecrest Drive Columbia, TN 38401

P.O. No.	Terms	Project
450652695	Net 30	

Quantity	Description	Rate	Amount
3,570	MONTHLY SKID STORAGE, JANUARY, 2008	3.00	10,710.00
TERMS: 1-1/2% Per Month Service Charge on Accounts Past Due		Total	\$10,710.00

DASCO, INC.

214 ADMIRAL CIRCLE
LAWRENCEBURG, TN 38464

Invoice

Date	Invoice #
1/31/2008	17450

Bill To
DELPHI 1974 Ridgecrest Drive Columbia, TN 38401

P.O. No.	Terms	Project
	Net 30	

Quantity	Description	Rate	Amount
	PLANT MAINTENANCE FOR FEBRUARY ,2008	2,750.00	2,750.00
TERMS: 1-1/2% Per Month Service Charge on Accounts Past Due		Total	\$2,750.00

DASCO, INC.

214 ADMIRAL CIRCLE
LAWRENCEBURG, TN 38464

Invoice

Date	Invoice #
2/27/2008	17453

Bill To
DELPHI 1974 Ridgecrest Drive Columbia, TN 38401

P.O. No.	Terms	Project
	Net 30	

Quantity	Description	Rate	Amount
	REMOVAL OF ELECTRICAL ON TEMPORARY TRAILER	300.00	300.00
	REPAIR OF OUTSIDE LIGHTING - MATERIALS & LABOR	438.00	438.00
TERMS: 1-1/2% Per Month Service Charge on Accounts Past Due		Total	\$738.00

DASCO, INC.

214 ADMIRAL CIRCLE
LAWRENCEBURG, TN 38464

Invoice

Date	Invoice #
2/29/2008	17457

Bill To
DELPHI 1974 Ridgcrest Drive Columbia, TN 38401

P.O. No.	Terms	Project
MAINTENANCE	Net 30	

Quantity	Description	Rate	Amount
	PLANT MAINTENANCE FOR MARCH, 2008	2,750.00	2,750.00
TERMS: 1-1/2% Per Month Service Charge on Accounts Past Due		Total	\$2,750.00

DASCO, INC.

214 ADMIRAL CIRCLE
LAWRENCEBURG, TN 38464

Invoice

Date	Invoice #
9/4/2008	17491

Bill To
DELPHI 1974 Ridgecrest Drive Columbia, TN 38401

P.O. No.	Terms	Project
450652695	Net 30	

Quantity	Description	Rate	Amount
2,625	STORAGE OF DUNNAGE, SEPTEMBER, 2008 2625 UNITS OFFSITE STORAGE	0.00 3.00	0.00 7,875.00
TERMS: 1-1/2% Per Month Service Charge on Accounts Past Due		Total	\$7,875.00

DASCO, INC.

214 ADMIRAL CIRCLE
LAWRENCEBURG, TN 38464

Invoice

Date	Invoice #
9/17/2008	17492

Bill To
DELPHI 1974 Ridgecrest Drive Columbia, TN 38401

P.O. No.	Terms	Project
	Net 30	

Quantity	Description	Rate	Amount
	DAVIS HEATING & COOLING,LLC - SERVICE AND REPAIR HVAC EQUIPMENT AS PER ATTACHED INVOICE	5,160.05	5,160.05
TERMS: 1-1/2% Per Month Service Charge on Accounts Past Due		Total	\$5,160.05

DASCO, INC.

214 ADMIRAL CIRCLE
LAWRENCEBURG, TN 38464

Invoice

Date	Invoice #
9/30/2008	17493

Bill To
DELPHI 1974 Ridgecrest Drive Columbia, TN 38401

P.O. No.	Terms	Project
4550652695	Net 30	

Quantity	Description	Rate	Amount
2,358	STORAGE OF DUNNAGE STACKABLE UNITS- OCTOBER, 2008	3.00	7,074.00
TERMS: 1-1/2% Per Month Service Charge on Accounts Past Due		Total	\$7,074.00

DASCO, INC.

214 ADMIRAL CIRCLE
LAWRENCEBURG, TN 38464

Invoice

Date	Invoice #
9/30/2008	17495

Bill To
DELPHI 1974 Ridgecrest Drive Columbia, TN 38401

P.O. No.	Terms	Project
450652695	Net 30	

Quantity	Description	Rate	Amount
1,001	STORAGE OF DUNNAGE, OCTOBER, 2008 1001 UNITS OFFSITE STORAGE	0.00 3.00	0.00 3,003.00
TERMS: 1-1/2% Per Month Service Charge on Accounts Past Due		Total	\$3,003.00